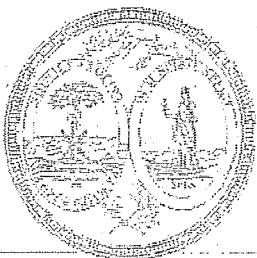


# **Exhibit A**



# South Carolina Department of Insurance

Capitol Center  
1201 Main Street, Suite 1000  
Columbia, South Carolina 29201

HENRY McMASTER  
Governor

RAYMOND G. FARMER  
Director

Mailing Address:  
P.O. Box 100105, Columbia, S.C. 29202-3105  
Telephone: (803) 737-6160

March 6, 2017

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
TRANSAMERICA LIFE INSURANCE COMPANY  
ATTN: General Counsel MS#2520  
4333 Edgewood Road NE  
Cedar Rapids, IA 52499

RECEIVED BY  
MAR 09 2017  
KPL/AL/INDPT

Dear Sir:

On March 6, 2017, I accepted service of the attached Summons and Complaint on your behalf. I am, hereby, forwarding that accepted process on to you pursuant to the provisions of S.C. Code Ann. § 38-5-70. By forwarding accepted process on to you, I am meeting a ministerial duty imposed upon me by S.C. Code Ann. § 15-9-270. I am not a party to this case. The State of South Carolina Department of Insurance is not a party to this case. It is important for you to realize that service was effected upon your insurer on my date of acceptance for service.

You must promptly acknowledge in writing your receipt of this accepted process to [sdubois@doi.sc.gov](mailto:sdubois@doi.sc.gov). When replying, please refer to File Number 165413, Linda Garrard v. TRANSAMERICA LIFE INSURANCE COMPANY, 2017-CP-42-0620.

By:

Sincerely Yours,

David E. Belton  
Senior Associate General Counsel  
(803)737-6132

Raymond G. Farmer  
Director  
State of South Carolina  
Department of Insurance

Attachment

CC: O. W. Bannister  
Post Office Box 10007  
Greenville, SC 29603

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF SPARTANBURG ) EIGHTH JUDICIAL CIRCUIT  
  
Linda Garrard, Personal Representative of ) C.A. NO. 2017-CP-42-0620  
the Estate of Charles Melvin Pearson, )  
Plaintiff, )  
vs. )  
Transamerica Life Insurance Company, f/k/a ) SUMMONS  
Stonebridge Life Insurance Company, )  
Defendant. )

To: The Defendant(s) Above Named:

You are hereby summoned and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the Complaint upon the subscriber at 401 Pettigru Street, Greenville, SC 29603, within thirty (30) days after the service hereof, exclusive of the day of such service. If you fail to answer the Complaint within that time, a judgment by default will be rendered against you for the relief demanded in the Complaint.

BANNISTER, WYATT & STALVEY, LLC

s/O. W. Bannister

O. W. Bannister  
SC Bar No. 506; Fed. ID No. 1184  
401 Pettigru Street (29601)  
P. O. Box 10007 (29603)  
Greenville, South Carolina  
Phone: (864) 298-0084; Fax: (864) 298-0146  
*Attorney for Plaintiff*

Greenville, South Carolina

February 23, 2017

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
COUNTY OF SPARTANBURG ) EIGHTH JUDICIAL CIRCUIT  
  
Linda Garrard, Personal Representative of ) C.A. NO. 2017-CP-42-  
the Estate of Charles Melvin Pearson, )  
Plaintiff, )  
vs. ) COMPLAINT  
Transamerica Life Insurance Company, f/k/a )  
Stonebridge Life Insurance Company, )  
Defendant. )

Plaintiff, complaining of the Defendant above-named, would respectfully show unto the Court as follows:

1. Defendant Transamerica Life Insurance Company, formerly known as Stonebridge Life Insurance Company, is a company organized and existing in the state of Iowa and licensed and conducting its business of selling life insurance in the State of South Carolina.
2. Plaintiff is the duly appointed Personal Representative of the Estate of Charles Melvin Pearson.
3. Prior to his death, Charles M. Pearson purchased three accidental death policies with the Defendant. Specifically, a policy identified as 72L52Q3041 which would pay the sum of \$10,000 for an accidental death; a policy with the Defendant numbered 74A52V3823 which would pay an accidental death benefit of \$25,000; and a policy with the Defendant numbered 75L5318401 which would pay an accidental death benefit of \$18,000.
4. Mr. Pearson died of an accidental death on July 29, 2014.
5. The Personal Representative thereafter made claim for the accidental death benefits on the said policies stated above.

6. Defendant has refused to pay the accidental death benefits pursuant to the policies.

7. Plaintiff is informed and believes and therefore alleges Defendant should be required to pay said sums pursuant to its contracts of insurance for the accidental death of its insured, Charles M. Pearson.

**FOR A FIRST CAUSE OF ACTION**  
**(Breach of Contract)**

8. Plaintiff reiterates the allegations previously set forth in this Complaint, as if the same were repeated herein.

9. That Defendant's refusal to pay the accidental death benefits as set out above constitutes breach of contract by Defendant. As such, Plaintiff is entitled to actual damages in payment of the policy limits on each of the accident death policies outlined in this Complaint.

**FOR A SECOND CAUSE OF ACTION**  
**(Bad Faith)**

10. Plaintiff reiterates the allegations previously set forth in this Complaint, as if the same were repeated herein.

11. That Defendant's vexatious refusal to pay the accident death benefits as set out above constitutes bad faith on the part of Defendant. As such, Plaintiff is entitled to actual and punitive damages, as well as attorney's fees and costs.

WHEREFORE, Plaintiff prays to have judgment against the Defendant for actual damages on the three policies named above, plus interest, punitive damages and attorney's fees

and costs for the bringing of this action, and for such further relief as the Court may deem just and proper.

BANNISTER, WYATT & STALVEY, LLC

s/O. W. Bannister

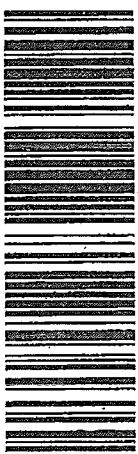
O. W. Bannister  
SC Bar No. 506; Fed. ID No. 1184  
401 Pettigru Street (29601)  
P. O. Box 10007 (29603)  
Greenville, South Carolina  
Phone: (864) 298-0084; Fax: (864) 298-0146  
*Attorney for Plaintiff*

Greenville, South Carolina

February 23, 2017

STATE OF SOUTH CAROLINA  
**DEPARTMENT OF INSURANCE**

P.O. BOX 100105  
COLUMBIA, S.C. 29202-3105



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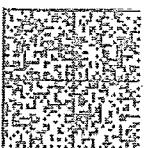
CERTIFIED MAIL

RETURN RECEIPT REQUESTED

SERVICE OF PROCESS

TRANSMERICA LIFE INSURANCE COMPANY  
ATTN: General Counsel MS#2520  
4333 Edgewood Road NE  
Cedar Rapids, IA 52409

Presort  
First Class Mail  
CombBarPrice



U.S. POSTAGE » PITNEY BOWE  
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